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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221839
Party	Plaintiff Kind LLC
Correspondence Address	MARGARITA WALLACH MCARTER & ENGLISH LLP 245 PARK AVENUE, 27TH FLOOR NEW YORK, NY 10167 UNITED STATES mwallach@mccarter.com, apang@mccarter.com, dlynch@mccarter.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Margarita Wallach, Esq.
Filer's e-mail	mwallach@mccarter.com, apang@mccarter.com, rdesalvo@mccarter.com
Signature	/mw/
Date	08/13/2015
Attachments	Motion to Extend Time.pdf(106939 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

KIND Management Inc.,)	
)	Opposition No. 91221839
)	
v.)	
)	
)	
KINDHUB, LLC,)	
)	
Applicant.)	
)	

**CONSENTED TO MOTION TO EXTEND THE DEADLINE FOR THE
DISCOVERY CONFERENCE, DISCOVERY PERIOD AND TRIAL DATES**

The parties, by and through their counsel, have agreed to extend the deadline for the Discovery Conference, the opening of the discovery period and all subsequent dates, with the Board's approval, for thirty (30) days. Accordingly, the parties move that such dates be extended as follows:

Deadline for Discovery Conference:	09/13/2015
Discovery Opens:	09/13/2015
Initial Disclosures Due:	10/13/2015
Expert Disclosure Due:	02/10/2016
Discovery Closes:	03/11/2016
Plaintiff's Pretrial Disclosures:	04/25/2016
Plaintiff's 30-day Trial Period Ends:	06/09/2016
Defendant's Pretrial Disclosures:	06/24/2016
Defendant's 30-day Trial Period Ends:	08/08/2016
Plaintiff's Rebuttal Disclosures:	08/23/2016
Plaintiff's 15-day Rebuttal Period Ends:	09/22/2016

The grounds for this stipulated motion are that the parties are unable to complete the Discovery Conference during the assigned period.

Opposer has secured the express consent of all parties to this proceeding for the extension and resetting of dates requested herein. In particular, counsel for Applicant consented to this motion, via e-mail, on August 11, 2015.

Opposer has provided an e-mail address herewith for itself and for the Applicant so that any order on this motion may be issued electronically by the Board.

Based on the foregoing, the parties respectfully request that the deadline for Discovery Conference, opening of discovery, and trial schedule be extended and that the testimony periods be reset accordingly, as set forth above.

This request is made in good faith and not for purposes of delay.

Date: August 13, 2015

Respectfully submitted,

McCarter & English, LLP

By: Margarita Wallach

Margarita Wallach

Gary H. Fechter

Lori Shyavitz

Alice M. Pang

Attorneys for Opposer

KIND Management Inc.

245 Park Ave, 27th Floor

New York, NY 10167

Tel: (212) 609-6800

Fax: (212) 609-6921

mwallach@mccarter.com

lshyavitz@mccarter.com

gfechter@mccarter.com

apang@mccarter.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on counsel for Applicant by First Class Mail at the following address:

Joel D. Leviton
Stinson Leonard Street LLP
150 5th Street, Ste. 2300
Minneapolis, Minnesota 55402
trademark.mpl@stinsonleonard.com
joel.leviton@stinsonleonard.com

Dated: August 13, 2015


Alice M. Pang